

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In The Matter of)	
)	
Structure and Practices of the Video Relay Service Program)	CG Docket No. 10-51
)	
Telecommunications Relay Services and Speech- to-Speech Services for Individuals with Hearing and Speech Disabilities)	CG Docket No. 03-123
)	

**SORENSEN’S RESPONSE IN SUPPORT
OF MOTION FOR EXTENSION OF TIME**

Sorenson Communications, Inc. (“Sorenson”) wholeheartedly supports the Consumer Groups’ motion seeking an extension of time for filing comments and replies in response to the sweeping reforms the Commission has proposed in these dockets.¹ As the Consumer Groups explain in their motion, the Commission’s Further Notice of Proposed Rulemaking (“FNPRM”) proposes a series of wholesale changes to the Video Relay Service (“VRS”) program that could directly and fundamentally impact consumers’ ability to communicate via VRS and point-to-point, providers’ business structures and strategies for providing service, and the Commission’s and Fund Administrator’s administration of the program.

The unnecessarily restrictive deadlines that the Commission has established for comments and replies create a genuine risk that the Commission will craft rules without the

¹ See Telecommunications for the Deaf and Hard of Hearing, Inc., National Association of the Deaf, Association of Late-Deafened Adults, Inc., Deaf and Hard of Hearing Consumer Advocacy Network, and California Coalition of Agencies Serving Deaf and Hard of Hearing, Inc., *Motion for Extension of Time*, CG Docket Nos. 10-51, 03-123 (filed Feb 13, 2013) (“Motion”); *Structure and Practices of the Video Relay Service Program*; *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CG Docket Nos. 10-51 and 03-123, Further Notice of Proposed Rulemaking, FCC 11-184 (rel. Dec 15, 2011).

benefit of complete and thorough responses from all stakeholders. Given the importance of this proceeding and the possibility of a sweeping impact, the Commission cannot afford to run the risk of moving ahead with an incomplete record. This is particularly true with respect to the reply comments which, under the existing schedule, must be filed only two weeks after interested parties first have a chance to review other commenters' views. (Due to time lags in posting comments to the Commission's website, the actual time for preparing replies is likely to be even shorter.)

Because the changes suggested in the FNPRM are so broad and so fundamental to all VRS stakeholders, the Commission should ensure that it allows sufficient time for commenters to develop a complete record. Accordingly, Sorenson supports the Consumers' Groups motion to extend the comment deadline to March 16, 2012, and an extension of the reply comment deadline until April 16, 2012.

Respectfully submitted,

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